

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

LOUISIANA HEALTH SERVICE &
INDEMNITY COMPANY D/B/A/ BLUE
CROSS AND BLUE SHIELD OF
LOUISIANA, and HMO LOUISIANA,
INC., on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN
ONCOLOGY, INC., JANSSEN
RESEARCH & DEVELOPMENT, LLC,
and BTG INTERNATIONAL LIMITED,

Defendants.

Case No. 1:19-cv-00474-LMB-JFA

**DEFENDANTS’
JOINT MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

Defendants Janssen Biotech, Inc., Janssen Oncology, Inc., Janssen Research & Development, LLC, and BTG International Limited respectfully submit this Motion under 28 U.S.C. § 1404(a) and, for the reasons set forth in the accompanying Memorandum in Support, declaration, and affidavit, hereby move this Court to transfer this case to the United States Court for the District of New Jersey. Venue is proper in the District of New Jersey and a transfer will best serve the convenience of parties and witnesses, save judicial resources, and avoid inconsistent judgments.

Dated: May 24, 2019

Respectfully submitted,

/s/ Gordon D. Todd

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CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2019, I electronically filed the foregoing with the Clerk of Court using the Court's Electronic Case Filing (ECF) system, which will then send a Notice of Electronic Filing (NEF) to the counsel of record in the above-captioned action.

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